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ILWU-PMA PENSION PLAN

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In pro per

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

TRUSTEES OF THE ILWU-PMA PENSION  
PLAN,

Plaintiffs,

v.

LINDRA ANDERSON and IRA J.  
ANDERSON,

Defendants.

Case No.: 4:14-cv-03694-LB

**JOINT STIPULATION REQUESTING  
COURT ISSUE ORDER &  
[PROPOSED] ORDER**

Pursuant to Local Rule 7-12 Plaintiffs Trustees of the ILWU-PMA Pension Plan, Defendant Lindra Anderson and Defendant Ira J. Anderson through their respective counsel stipulate as follows:

1. On August 11, 2015, the parties participated in an Early Neutral Evaluation (“ENE”) and mediation with neutral Steve Schrey. Following the Evaluation, the parties agreed to participate in mediation and reached a settlement in the above referenced matter.

2. Pursuant to the terms of the settlement, the parties jointly agree to and request that the Court issue an order:

a. Declaring Ira J. Anderson to be Richard Anderson, Jr.’s qualified surviving spouse;

b. Directing the ILWU-PMA Pension Plan (the “Plan”) to pay the segregated survivor benefits on account of Richard Anderson, Jr. to the Trust Account of Rita Holder, attorney of record for Ira J. Anderson within 10 business days of the date of the Court’s order;

c. Directing the Plan to pay any future survivor benefits on account of Richard Anderson, Jr. to Ira J. Anderson;

d. Ordering that Plaintiffs Trustees of the ILWU-PMA Pension Plan, the Benefit Plans Office, the International Longshore and Warehouse Union and Pacific Maritime Association be released and discharged from any liability for their payment of monthly survivor benefits payable under the Plan on account of Richard Anderson, Jr. in accordance with the Court’s order;

e. Dismissing the above referenced case with prejudice; and

f. Ordering that each party will bear its own attorney’s fees and costs.

**IT IS SO STIPULATED.**

Respectfully Submitted,

Dated: October 26, 2015

LEONARD CARDER LLP

By /s/ Lindsay R. Nicholas  
Lindsay R. Nicholas  
Anna L. Scholin

SEYFARTH SHAW LLP

By /s/ Courtney K. Bohl  
Kathleen Cahill-Slaught  
Courtney K. Bohl

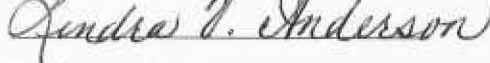
CO-COUNSEL FOR THE JOINT TRUSTEES OF THE  
ILWU-PMA PENSION PLAN

Dated: October 26, 2015

By /s/ Rita A. Holder  
Rita A. Holder

ATTORNEY FOR DEFENDANT IRA J. ANDERSON

Dated: October 26, 2015

By   
Linda V. Anderson

IN PRO PER

**ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)**

I, Courtney K. Bohl, attest that concurrence in the filing of this document has been obtained from the signatories Lindsay Nicholas, Lindra V. Anderson and Rita Holder.

Executed this 9<sup>th</sup> day of ~~October~~ November, 2015 in Sacramento, California.

By /s/ Courtney K. Bohl  
Courtney K. Bohl



**ORDER**

Pursuant to the Parties' stipulation and good cause appearing therefore, the Court hereby orders the following:

- a. Ira J. Anderson is Richard Anderson, Jr.'s qualified surviving spouse;
- b. The ILWU-PMA Pension Plan (the "Plan") shall pay the segregated survivor benefits on account of Richard Anderson, Jr. to the Trust Account of Rita Holder, attorney of record for Ira J. Anderson within 10 days of the entry of this Order;
- c. The Plan shall pay any future survivor benefits on account of Richard Anderson, Jr. to Ira J. Anderson;
- d. Plaintiffs Trustees of the ILWU-PMA Pension Plan, the Benefit Plans Office, the International Longshore and Warehouse Union and Pacific Maritime Association are hereby released and discharged from any liability for their payment of monthly survivor benefits payable under the Plan on account of Richard Anderson, Jr. that are paid in accordance with this Court's order;
- e. This case is hereby dismissed with prejudice and each party shall bear their own attorney's fees and costs.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 13, 2015



UNITED STATES MAGISTRATE JUDGE